



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WMP  
F.#2009R00969

271 Cadman Plaza East  
Brooklyn, New York 11201

December 19, 2011

**BY FEDERAL EXPRESS AND ECF**

Jeffrey L. Kradel, Esq.  
Kradel Defense PLLC  
One Union Square, Suite 1928  
600 University Street  
Seattle, Washington 98101

Re: United States v. William C. Lange  
Criminal Docket No. 10-968 (DLI)

Dear Mr. Kradel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures under cover of letters dated March 14, 2011, March 22, 2011, April 19, 2011, June 17, 2011, July 6, 2011 and October 7, 2011. The government again requests reciprocal discovery.

Enclosed are thirteen discs that contains copies of the following documents:

- DISC 18 (Bates stamped EDNY-HFGI-047305 - EDNY-HFGI-053367)
  - Bank of New York Mellon records (EDNY-HFGI-047305 - EDNY-HFGI-047318)
  - Bank of America records (EDNY-HFGI-047319 - EDNY-HFGI-047616)
  - Credit Union 1 records (EDNY-HFGI-047617 - EDNY-HFGI-048603)
  - Records concerning David Jay (EDNY-HFGI-048604 - EDNY-HFGI-048875)
  - HFGI and other corporate documents provided by Frank Perkins (EDNY-HFGI-048876 - EDNY-HFGI-049056)

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- Kaiser and Company records (EDNY-HFGI-049057 - EDNY-HFGI-049179)
- Regions Bank records (EDNY-HFGI-049180 - EDNY-HFGI-049833)
- Documents from Wendell and Company (EDNY-HFGI-049834 - EDNY-HFGI-049856)
- Documents concerning Global Community Development, LLC (EDNY-HFGI-049857 - EDNY-HFGI-049918)
- Vonage records for telephone number (718) 238-3693 (EDNY-HFGI-049919 - EDNY-HFGI-050043)
- Capital One records for William Lange's Visa credit card accounts (EDNY-HFGI-050044 - EDNY-HFGI-050414)
- Documents concerning victims of HFGI (EDNY-HFGI-050415 - EDNY-HFGI-051218 and EDNY-HFGI-051409 - EDNY-HFGI-051509)
- Documents concerning a victim of BSMI (EDNY-HFGI-051219 - EDNY-HFGI-051358)
- GoDaddy.com records concerning HFGI, BSMI and other companies owned or controlled by William Lange (EDNY-HFGI-051359 - EDNY-HFGI-051399)
- Analysis by Fremont Analytical on certain samples of sand (EDNY-HFGI-051400 - EDNY-HFGI-051408)
- Joseph Pascua's notes (EDNY-HFGI-051510 - EDNY-HFGI-053367)
- DISC 19 (Bates stamped EDNY-HFGI-053368)
  - Video concerning BSMI provided by John Glassman
- DISC 20 (Bates stamped EDNY-HFGI-053369)
  - First Citizen's Bank records concerning William Lange and his companies
- DISC 21 (Bates stamped EDNY-HFGI-053370)
  - GoDaddy.com records concerning domain listings and email addresses for BSMI, Arce Holdings and other companies owned or controlled by William Lange

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- DISC 22 (Bates stamped EDNY-HFGI-053371)
  - Kaiser and Company records concerning HFGI, William Lange and Stacey Lange (password: qua9rry7)
- DISC 23 (Bates stamped EDNY-HFGI-053372)
  - Verizon records concerning telephone number (253) 441-0066
- DISCS 24-32 (Bates stamped EDNY-HFGI-053373 - EDNY-HFGI-053381)
  - US Bank records concerning Joseph Pascua

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By:                     /s/                      
Winston M. Paes  
Assistant U.S. Attorney  
(718) 254-6023

Enclosures

CC: Clerk of the Court (DLI) (w/o enclosures) (by ECF)